



Cyprus Miami Mining Corporation  
Post Office Box 4444  
Claypool, Arizona 85532

January 14, 1994

Certified Mail No. P036332020

EPA, Region IX, Regional Administrator  
Toxics and Waste Management Division  
215 Fremont Street  
San Francisco, CA 94105

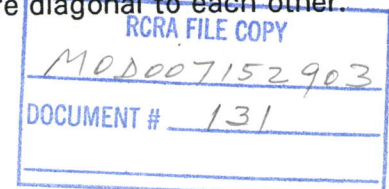


RE: Manifest Discrepancy, Manifest Document No. 00584; Mo. Manifest Document No 0054  
Generator: Litton Systems, ACD EPA ID No. MOD007152903  
Transporter: Tri-State Motor Transit Co. EPA ID No. MOD095038998  
Facility: Cyprus Miami Mining Corp, EPA ID No. AZD060624251  
Receive Date: 01/06/94

In accordance with 40 CFR 265.72, Manifest Discrepancies, Cyprus Miami Mining Corporation (Cyprus Miami) herein describes an unresolved manifest quantity/count discrepancy and the attempts to resolve.

On January 6, 1994, Cyprus Miami received a shipment, Appointment 5002, from Litton Systems, ACD on Manifest Document No. 00584, Missouri Manifest Document No. 0054. The number of containers (12.) indicated on the manifest was 22, and the total quantity (13.) indicated was 22 Y. However when the shipment was unloaded and counted by the receiving personnel, the receiver indicated there were 20 bag containers and corresponding 20 Y. The following events occurred.

1. The driver for the transporter when first questioned thought the manifest number of 22 should be correct as he said he remembered counting during loading. He stated the van had not been opened since it was loaded at the generator's facility.
2. Cyprus Miami personnel recounted the bags and examined the unloading area to see if any containers were overlooked. No containers had been emptied into the receiving hopper. There were no other bag containers received that day. Recount by two different Cyprus Miami personnel confirmed receipt of 20 containers.
3. The generator, Litton's Mr. Neil Schaffer was contacted about the discrepancy. Mr. Schaffer checked with his loading personnel and they confirmed to him that the shipment was counted prior to shipment and the count was 22.
4. While the facility was talking to the generator about the discrepancy, the driver then began to recall that the generator was going to ship a full load of 22 bags but due to icy conditions after loading 9 bags side by side, two bags per row, (for a total of 18) they could not get the last two rows into the van so only two more bags were loaded at the end of van, for a total of 20 bags. The receiving personnel later verified that the van was loaded 9 rows of two and that the last two rows had only one bag each and they were more diagonal to each other.



5. Cyprus Miami personnel and the driver counted the bags again and confirmed that only 20 bag containers were received.

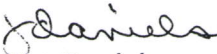
6. The generator was again contacted and apprised of the recount and what the driver had remembered. The generator advised that they would continue their investigation and get back to Cyprus Miami. However at this time, generator's personnel maintained shipment of 22 containers.

7. The transporter's driver was further questioned and maintained that the van trailer was not opened after loading until material was unloaded. The driver agreed that only 20 bags were received. The driver re-stated that he now remembered how the icy conditions caused only 20 containers to be loaded and that perhaps the generator and he made a mistake by putting 22 as the number on the manifest. Driver stated they counted by two's by row and that the last two rows only had one bag each which would result in a total of 20.

8. The manifest was signed with a discrepancy notation.

9. The generator advised that their personnel still maintain that they counted 22 bags on the trailer when it was shipped. Litton's personnel remembers counting each bag individually and not by rows.

Cyprus Miami concludes that most probably only 20 bags were shipped, at least only 20 were received. The material would be of no real value to anyone other than a copper smelter so there would be no reason to sell or abandon the material. Cyprus Miami believes that no foul play occurred other than poor memory or an honest mistake in the counting of the number of bag containers.

  
Janet Daniels  
Production Coordinator, Resource Recycling  
(602) 473-7135

Enclosure: Copy of Manifest

cc: EPA, Region VII  
RCRA Branch  
726 Minnesota Ave.  
Kansas City, KA 66101

Missouri Department of Natural Resources  
Division of Environmental Quality  
Waste Management Program  
P. O. Box 176  
Jefferson City, MO 65102

ADEQ  
Waste Assessment Unit, 5th Floor  
3033 North Central Ave.  
Phoenix, AZ 85012

Litton Advanced Circuitry Division  
Tri-State Motor Transit Co.

littonmf.dis

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET.

THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI-DESTINED  
SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Waste Management Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page of	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address		LITTON SYSTEM, ACO 4811 W. KARNBY SPRINGFIELD, MO. 65803		A. Missouri Manifest Document Number	0054	
4. Generator's Phone		(417) 862-0751		B. State Generator's ID - other	01317	
5. Transporter 1 Company Name		TRI-STAR MOTOR TRANSIT CO.		C. MO. Transporter's ID	H-1144	
6. US EPA ID Number		MO. 0095038998		D. Transporter's Phone	800-641-7580	
7. Transporter 2 Company Name				E. MO. Transporter's ID		
8. US EPA ID Number				F. Transporter's Phone		
9. Designated Facility Name and Site Address		CYPRUS MIAMI MINING CORP. Hwy 60 CLAYPOOL ARIZ. 85532		G. State Facility's ID		
10. US EPA ID Number		AZ. 0060624251		H. Facility's Phone	602-473-7080	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol.	1. Waste No.	
a. RD, HAZARDOUS WASTE SOLID, N.O.S., 9, PG II, NA 3077, (LEAD) (008-120-PO06-1000)		0,2,2	6A	0,2,2 Y	EPA WASTE CODE 1000 PO06	
b.					EPA WASTE CODE	
c.					EPA WASTE CODE	
d.					EPA WASTE CODE	
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
a. FROM ELECTROPLATING OPERATION		Y01				
b.						
c.						
d.						
15. Special Handling Instructions and Additional Information						
TRAILOR DISC. PLATE STATE PA - DT 11508 CA. MATERIAL IS RECLAIMED - EMER. CONTACT - NRI SCHAFER OR B.M. COORDINATOR ON DUTY						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
Printed/Typed Name		Signature		Month Day Year		
B. W. A. CAMERON				0110394		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Month Day Year		
Ed Pierson				0110394		
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
11a. PG should read III to resolve. 12. Received 20 BA 13. 20 Y. contacted generator						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		
Janet Daniels				0110694		

MISSOURI DNR FINAL COPY - PART 1

THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR.